

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ERNEST FLAGG, as Next Friend of  
JONATHAN BOND, a minor,

Plaintiff,

v

Case No.: 05-CV-74253  
Hon. Gerald E. Rosen  
Magistrate Judge R. Steven Whalen

CITY OF DETROIT, a municipal corporation;  
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;  
DEPUTY DETROIT POLICE CHIEF CARA BEST;  
JOHN DOE POLICE OFFICERS 1-20; ASST.  
DEPUTY POLICE CHIEF HAROLD CURETON;  
COMMANDER CRAIG SCHWARTZ; POLICE LT.  
BILLY JACKSON; MAYOR KWAME M. KILPATRICK,  
CHRISTINE BEATTY, jointly and severally,

Defendants.

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**DEFENDANT, CHRISTINE BEATTY'S, CONCURRENCE IN DEFENDANT CITY OF  
DETROIT'S *AMENDED EMERGENCY* MOTION TO STAY CIVIL PROCEEDINGS  
AND MOTION FOR ISSUANCE OF "GAG ORDER"**

NOW COMES Defendant, Christine Beatty (“Beatty”), by and through her attorneys, Morganroth & Morganroth, PLLC, and hereby states her concurrence with Defendant City of Detroit’s *Amended Emergency* Motion to Stay Civil Proceedings and Motion for Issuance of “Gag Order” as follows:

1. Beatty also filed her own Motion for Stay of Proceedings on April 7, 2008.
2. Beatty concurs and agrees that the instant civil proceedings should be stayed for the reasons set forth in the City of Detroit’s instant Motion as well as for the reasons set forth in her own Motion for Stay of Proceedings
3. Beatty also concurs and agrees that it would be appropriate for this Court to enter a narrowly tailored “gag order” relating exclusively to comments directly about this case for the reason set forth in the City’s Motion. Beatty further respectfully requests that any “gag order” should recognize and acknowledge that there are several other cases or matters, including, but not limited to, the Wayne County Criminal case, the Wayne County FOIA case, the Wayne County case filed by attorney O’Meara, and the Detroit City Council investigation, which deal with or involve overlapping issues that Plaintiff has made clear he intends to inject into this case and therefore any “gag order” should only restrict and limit comments made directly about this case.

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WHEREFORE, Beatty respectfully requests that this Court grant the instant Motion as well as Beatty's Motion to Stay together with all other and further relief as is just and proper under the circumstances.

Respectfully submitted,

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By: /s/ Mayer Morganroth  
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Dated: April 11, 2008

#### CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Norman Yatooma, Attorney.  
Kenneth L. Lewis, Attorney

John A. Schapka, Attorney  
Krystal A. Cittendon, Attorney

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Dated: April 11, 2008

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